

DMB



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MAY 29 1988  
L-86-225

Dr. J. Nelson Grace  
Regional Administrator, Region II  
U. S. Nuclear Regulatory Commission  
Suite 2900  
101 Marietta Street, N.W.  
Atlanta, Georgia 30323

Dear Dr. Grace:

Re: St. Lucie Unit 1 and 2  
Docket Nos. 50-335 and 50-389  
Inspection Report 86-07 and 86-06

Florida Power & Light Company has reviewed the subject inspection report, and a response is attached.

There is no proprietary information in the report.

Very truly yours,

for C. O. Woody  
Group Vice President  
Nuclear Energy

COW/SAV:de

Attachment

cc: Harold F. Reis, Esquire  
PNS-LI-86-169

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ATTACHMENT

L-86-225

Re: St. Lucie Unit 1 and 2  
Docket Nos. 50-335 and 50-389  
Inspection Report 86-07 and 86-06

FINDING

Units 1 and 2 Technical Specification (TS) 6.8.1.c requires that procedures be implemented for surveillance and test activities of safety-related equipment.

Contrary to the above, Administrative Operating Procedures 1 and 2-0010125, Schedule of Periodic, Tests Checks and Calibrations and 0010127, Reactor Engineering Schedule of Periodic Tests and Reports, were not adequately implemented in that the following surveillance tests were not performed within the specified time intervals.

- a. On September 29, 1985, the 25 percent time extension was exceeded for the quarterly main steam isolation valve (MSIV) part-stroke surveillance test required by Unit 1 TS 4.7.1.5.
- b. On January 10, 1986, the 25 percent time extension was exceeded for the automatic actuation logic monthly surveillance test, required by Unit 2 TS Table 4.3-2, for the auxiliary feedwater actuation system (AFAS).
- c. On February 7, 1986, the 25 percent time extension was exceeded for the monthly setpoint calculation and adjustment of the fixed incore alarm system required by Unit 2 TS 4.2.1.4.
- d. On February 13, 1986, the 25 percent time extension was exceeded for the semi-annual engineered safety features actuation system (ESFAS) relay surveillance test required by Unit 2 TS Table 4.3-2.



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RESPONSE

1. FPL concurs with the violation.
2. The reason for the violation is as follows:
  - a. The quarterly main steam isolation valve (MSIV) part-stroke surveillance test required by Unit 1 Technical Specification 4.7.1.5 exceeded the 25% extension time due to a cognitive personnel error. The operator reviewed only the semi-annual, annual, and 18-month surveillances, and inadvertently neglected the quarterly list.
  - b. The Auxiliary Feedwater Actuation Logic monthly surveillance test required by Unit 2 Technical Specification Table 4.3-2 exceeded the 25% extension time due to a cognitive personnel error. Instrumentation and Control Department personnel erroneously applied a date to the Plant Work Order (PWO) for completion that was in excess of the 25% extension.
  - c. The Fixed Incore Alarm System monthly setpoint calculation and adjustment required by Unit 2 Technical Specification 4.2.1.4 exceeded the 25% extension time due to a non-licensed utility personnel error. The personnel error was an oversight in reading the surveillance schedule.
  - d. The Engineered Safety Features Actuation System (ESFAS) relay semi-annual surveillance test required by Unit 2 Technical Specifications Table 4.3-2 exceeded the 25% extension time due to an oversight in including this surveillance in the semi-annual check sheet.
3. The corrective steps taken were to perform the required surveillances. Those personnel involved were counseled on the necessity to perform surveillances during the required interval. Those procedures involved were revised as necessary.

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4. The corrective steps which will or have been taken to avoid further violations were:
  - a. Quality Control performed a review of their log to identify any problem areas, especially Unit 2, and generated procedure changes to enhance the schedule of surveillances.
  - b. FPL considers this item complete, however, based on St. Lucie's past performance, we have reviewed the surveillance program and found that the following programatic changes are necessary to ensure continued high performance:
    1. Each Department will have their own scheduling procedure.
    2. An individual will be assigned in each department to oversee the surveillance completion.
5. Full compliance for item 3 was achieved on April 8, 1986. Item 4a above was completed on May 9, 1986. Item 4b is expected to be completed on August 15, 1986.